

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 USC Sections 846, 841(a)(1), 841(b)(1)(C)

Petty
 Minor
 Misdemeanor
 Felony

PENALTY:

See penalty sheet attachment

PROCEEDING

Name of Complainant Agency, or Person (&Title, if any)

DBA

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprocution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

10-70336 BZ

Name and Office of Person

Furnishing Information on THIS FORM Joseph P. Russoniello

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y

(if assigned) Nicole M. Kim

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST 4/23/2010 Month/Day/Year

Or... if Arresting Agency & Warrant were not Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

PROCESS:

SUMMONS NO PROCESS* WARRANT Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments: _____

Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S. 6

YURI LAMBERT

DISTRICT COURT NUMBER

CR 10 0876

JSW

**PENALTY SHEET ATTACHMENT:
YURI LAMBERT**

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

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10-70336 BZ

Name and Office of Person Furnishing Information on THIS FORM

Joseph P. Russoniello

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y
 (if assigned)

Nicole M. Kim

Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

JAMES EDMONDS

DISTRICT COURT NUMBER

FILED
2010 MAY 6 P

JSW

CLERK RICHARD H. HARRIS
FEDERAL DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT

IS NOT IN CUSTODY

1) Has not been arrested, pending outcome this proceeding.
 If not detained give date any prior summons was served on above charges

2) Is a Fugitive

3) Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

4) On this charge

5) On another conviction

6) Awaiting trial on other charges } Fed'l State

If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

4/23/2010

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

PROCESS:

SUMMONS NO PROCESS*

WARRANT Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

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Defendant Address:

Date/Time: _____

Before Judge: _____

Comments: _____

PENALTY SHEET ATTACHMENT:
JAMES EDMONDS

CR 10

2010 MAY 03 76 FILED JSW
CLERK'S OFFICE, U.S. DISTRICT COURT
CLARK COUNTY, NEVADA
3:22

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 USC Sections 846, 841(a)(1), 841(b)(1)(C)

Petty
 Minor
 Misdemeanor
 Felony

PENALTY:

See penalty sheet attachment

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SHOW DOCKET NO.

MAGISTRATE CASE NO.

10-70336 BZ

Name and Office of Person

Furnishing Information on
THIS FORM

Joseph P. Russoniello

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y
(if assigned)

Nicole M. Kim

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT U.S.

RICHARD W.

OSHAN COOK

DISTRICT ATTORNEY

DEFENDANT

IS NOT IN CUSTODY

1) Has not been arrested, pending outcome this proceeding.
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Northern District of California

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5) On another conviction

6) Awaiting trial on other charges } } } Fed'l } State

If answer to (6) is "Yes", show name of institution

Has detainer been filed?

Yes
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DATE OF ARREST

4/23/2010

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

Date/Time:

Before Judge:

Comments:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time:

Before Judge:

PENALTY SHEET ATTACHMENT:
OSHAN COOK

FILED
2010 MAY 03 76 PM
RICHARD IV WICKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
JSW

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

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Count 3

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

21 USC Sections 846, 841(a)(1), 841(b)(1)(C)

Petty
 Minor
 Misdemeanor
 Felony

PENALTY:

See penalty sheet attachment

PROCEEDING

Name of Complainant Agency, or Person (&Title, if any)

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person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

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this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

10-70336 BZ

Name and Office of Person

Furnishing Information on THIS FORM Joseph P. Russoniello

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y
(if assigned)

Nicole M. Kim

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST 4/23/2010 Month/Day/Year

Or... if Arresting Agency & Warrant were not given Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

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SUMMONS NO PROCESS*

WARRANT Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

2010 MAY 6

DEFENDANT - U.S.

VICTORIA VANLAANEN

DISTRICT COURT NUMBER

CR 10 0376

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State

If answer to (6) is "Yes", show name of Institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST 4/23/2010 Month/Day/Year

Or... if Arresting Agency & Warrant were not given Month/Day/Year

PENALTY SHEET ATTACHMENT:
VICTORIA VANLAANEN

CR 100376-22

2010 MAY 6 FILED JSW
CLERK, U.S. DISTRICT COURT
RICHARD H. LAMBERT, CLERK

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA
CR 10 0376 P
VENUE: SAN FRANCISCO

2010 MAY 6 FILED
RECEIVED
RICHARD W. BICKING
CLERK OF THE
NORTHERN DISTRICT OF CALIFORNIA

JSW

UNITED STATES OF AMERICA,

v.

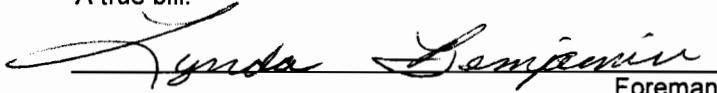
YURI LAMBERT,
JAMES EDMONDS,
OSHAN COOK, and
VICTORIA VANLAANEN,

DEFENDANTS

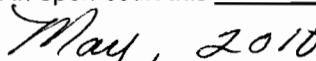
INDICTMENT

21 U.S.C. § 846- Conspiracy to Possess with Intent to Distribute and to Distribute
MDMA;
21 U.S.C. §§ 841(a)(1) & (b)(1)(C) - Possession with Intent to Distribute MDMA;
18 U.S.C. § 2 - Aiding and Abetting; Criminal Forfeiture Allegation

A true bill.


Lynda Lempainen
Foreman

Filed in open court this 6 day of


May, 2010


Joseph C. Spero
KAREN L. HOM
Clerk
UNITED STATES MAGISTRATE JUDGE

Bail, \$ no prob

1 JOSEPH P. RUSSONIELLO (CABN 44332)
2 United States Attorney
3
4
5
6
7

2010 MAY -6 P 3:22
FILED
RICHARD J. WICKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JSW

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA

CR

No 10 0376

13) VIOLATIONS: 21 U.S.C. § 846 –
14) Conspiracy to Possess with Intent to
15) Distribute and to Distribute MDMA;
16) 21 U.S.C. §§ 841(a)(1) & (b)(1)(C) –
17) Possession with Intent to Distribute MDMA;
18) 18 U.S.C. § 2 – Aiding and Abetting;
19) Criminal Forfeiture Allegation
Defendants.) SAN FRANCISCO VENUE

20 INDICTMENT

21 The Grand Jury charges:

22 COUNT ONE:

23 Beginning at a time unknown to the Grand Jury, but no later than in or around March
24 2010, and continuing thereafter up through and including April 22, 2010, both dates being
25 approximate and inclusive, in the Northern District of California and elsewhere, the defendants,

26 YURI LAMBERT,
27 JAMES EDMONDS,
OSHAN COOK, and
28 VICTORIA VANLAANEN,
INDICTMENT

JSW

1 and others known and unknown, knowingly and intentionally conspired to possess with intent to
2 distribute and to distribute 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I
3 controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and
4 841(b)(1)(C).

5 COUNT TWO:

6 On or about April 22, 2010, in the Northern District of California, the defendants,

7 YURI LAMBERT,
8 JAMES EDMONDS,
9 OSHAN COOK, and
VICTORIA VANLAANEN,

10 did knowingly and intentionally possess with intent to distribute
11 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, in violation
12 of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States
13 Code, Section 2.

14 COUNT THREE:

15 On or about April 22, 2010, in the Northern District of California, the defendant,

16 OSHAN COOK,

17 did knowingly and intentionally possess with intent to distribute 3,4
18 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, in violation of
19 Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States
20 Code, Section 2.

21 FORFEITURE ALLEGATION:

22 1. The factual allegations contained in Counts One, Two and Three of this
23 Indictment are re-alleged and fully incorporated herein for the purpose of alleging forfeiture
24 pursuant to the provisions of 21 U.S.C. §§ 853(a)(1) and (a)(2).

25 2. Upon a conviction of any of the offenses alleged in Counts One, Two and Three

26 //

27 //

28 //

1 of this Indictment, the defendants,

2 YURI LAMBERT,
3 JAMES EDMONDS,
4 OSHAN COOK, and
5 VICTORIA VANLAANEN,

6 shall forfeit to the United States all right, title, and interest in property constituting and derived
7 from any proceeds defendants obtained, directly or indirectly, as a result of said violations, and
any property used, or intended to be used, in any manner or part, to commit or to facilitate the
commission of the said violations.

8 3. If, as a result of any act or omission of the defendants, any of said property

9 a. cannot be located upon the exercise of due diligence;
10 b. has been transferred or sold to or deposited with, a third person;
11 c. has been placed beyond the jurisdiction of the Court;
12 d. has been substantially diminished in value; or
13 e. has been commingled with other property which cannot be divided without
difficulty;

14
15 any and all interest defendants have in any other property (not to exceed the value of the above
16 forfeitable property) shall be vested in the United States and forfeited to the United States.

17 All in violation of Title 21, United States Code, Section 853(a)(1), (a)(2), (p) and Rule
18 32.2 of the Federal Rules of Criminal Procedure.

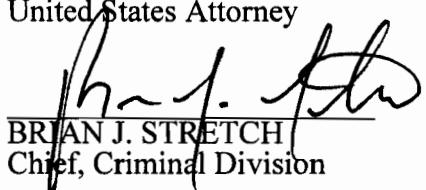
19
20 DATED:

21 *May 6, 2010*

22 A TRUE BILL.

23 
24 FOREPERSON

25
26 JOSEPH P. RUSSONIELLO
27 United States Attorney

28 
BRIAN J. STRETCH
Chief, Criminal Division

(Approved as to form) 
AUSA NICOLE M. KIM